

**UNITED STATES DISTRICT COURT OF THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHICAGO WOMEN IN TRADES, Plaintiff, v. PRESIDENT DONALD J. TRUMP, DEPARTMENT OF LABOR, ACTING SECRETARY OF LABOR VINCENT MICONE, OFFICE OF MANAGEMENT AND BUDGET, DIRECTOR OF THE OFFICE OF MANAGEMENT AND BUDGET RUSSELL VOUGHT, U.S. DEPARTMENT OF JUSTICE, ATTORNEY GENERAL OF THE U.S. DEPARTMENT OF JUSTICE PAMELA BONDI, Defendants.	Case No. 1:25-cv-02005 Judge: Hon. Matthew F. Kennelly JURY TRIAL DEMANDED
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**MOTION TO SUPPLEMENT THE FACTUAL RECORD
IN SUPPORT OF PLAINTIFF’S MOTION FOR TEMPORARY
RESTRAINING ORDER AND MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Chicago Women in Trade (“CWIT”), by and through its undersigned counsel, hereby do move the Court to supplement the factual record in advance of the hearing scheduled for March 25, 2025 at 10:00 AM.

On Thursday, March 20, 2025, following the Fourth Circuit stay of the Maryland court’s nationwide injunction in *National Association of Diversity Officers in Higher Education, et al. v. Trump, et al.*, No. 25-1189 (4th Cir. Mar. 14, 2025), Jayne Vellinga, Executive Director of CWIT, received an email from Barbara Gibson, Workforce Development Specialist at the U.S. Department of Labor’s (“DOL”) Employment and Training Administration.

The DOL's March 20, 2025 email recirculated a copy of the Training and Employment Notice first published and sent to Ms. Vellinga on January 22, 2025 (and which is attached as Exhibit 2 to Ms. Vellinga's March 5, 2025 Declaration (Dkt. 26-9)). Among other things, this Notice directs CWIT, and numerous other agencies and organizations, to "[e]ffective immediately . . . cease all activities related to 'diversity, equity, and inclusion' (DEI) or 'diversity, equity, inclusion, and accessibility' (DEIA) under their federal awards." A true and correct copy of this email and its attachment is attached hereto as **Exhibit A** (redacted for privilege).

As explained in detail in Plaintiff's Memoranda of Law in support of its Motion for Temporary Restraining Order (Dkt. 41), and Motion for Preliminary Injunction (Dkt. 26), CWIT is at a loss for how to reconcile the attached Notice with the work it currently undertakes in connection with its federal grants and contracts.

Plaintiff respectfully request that the Court add the attached Exhibit to the factual record in support of its pending motions.

Dated: March 24, 2025

Respectfully Submitted,

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**Pro hac vice motion forthcoming*